

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)	
)	
Clinton County Telephone Company)	
)	
Transferor)	
)	WC Docket No. 17-101
and)	
)	
Chapin Communications Corporation)	
)	
Transferee)	
)	
Application for Authorization Pursuant to)	
Section 214 of the Communications Act of 1934,)	
as Amended, for Assignment of Assets)	

ADDITIONAL SUPPLEMENT TO APRIL 18, 2017
APPLICATION FOR TRANSFER OF CONTROL

Clinton County Telephone Company (“Clinton), Westphalia Telephone Company (“WTC”), Westphalia Broadband, Inc. (“WBI”) and Chapin Communications Corporation (collectively, “Applicants”), by undersigned counsel to the Applicants as noted below, hereby file this additional supplement to the above-reference application filed April 18, 2017. This supplement is being filed in response to questions raised by Commission Staff on May 5, 2017. The instant submission is the “redacted” version. The affected companies are submitting today the confidential version of the attached pursuant to the requirements of 47 C.F.R. §0.459.

May 24, 2017

Respectfully submitted,

Clinton County Telephone Company
Westphalia Telephone Company
Westphalia Broadband, Inc.

By: 

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REDACTED – FOR PUBLIC INSPECTION
Filed Pursuant to the Requirements of 47 CFR §0.459
Supplement of Clinton County Telephone
WC Docket No. 17-101

Responses to May 5, 2017 Federal Communications Staff Questions

For Clinton County Telephone (Westphalia):

- Westphalia Telephone Company's unaudited income statement filed with its 2016 Form 481 shows [REDACTED] from prior year to this year. Please explain the reasons for this increase.

[REDACTED]

- Westphalia's unaudited income statement also [REDACTED] from prior year to this year. Please explain the reasons for this increase.

[REDACTED]

- Does Clinton County Telephone have an audited financial report for any or all of the calendar or fiscal years 2014, 2015, 2016 for itself and/or its wholly owned subsidiaries Westphalia Telephone Company and Westphalia Broadband Inc.? If so, please provide these reports in their entirety including all statements and notes that are a part of the audited report.

Attached are the audited financial statements for Clinton County Telephone Company, including consolidating statements for Westphalia Telephone Company and Westphalia Broadband Inc, and for Westphalia Telephone Company for 2014. There are no audited financials for any of these companies for 2015 or 2016.

- If Clinton County Telephone does not have the audited financial reports requested above, does it have any financial statements that have been reviewed by a Certified Public Accountant for any or all of the calendar or fiscal years 2014, 2015, and 2016? If so, please provide the CPA's review and any notes or statements the CPA may have provided with its review.

Attached are the reviewed, but unaudited financial report for Westphalia Telephone Company for 2015. Westphalia Telephone Company has engaged Moss Adams to review its 2016 financial statements, but that review is not complete at this time. There are no reviewed financial reports for Clinton County Telephone or Westphalia Broadband for 2015 or 2016.

REDACTED – FOR PUBLIC INSPECTION

Filed Pursuant to the Requirements of 47 C.F.R. §0.459

Supplement of Clinton County Telephone Company

WC Docket No. 17-101

Responses to May 5, 2017 Federal Communications Commission Staff Questions

Attachment 1

REDACTED IN ITS ENTIRETY

REDACTED – FOR PUBLIC INSPECTION

Filed Pursuant to the Requirements of 47 C.F.R. §0.459

Supplement of Clinton County Telephone Company

WC Docket No. 17-101

Responses to May 5, 2017 Federal Communications Commission Staff Questions

Attachment 2

REDACTED IN ITS ENTIRETY

REDACTED – FOR PUBLIC INSPECTION

Filed Pursuant to the Requirements of 47 C.F.R. §0.459

Supplement of Chapin Communications Corporation

WC Docket No. 17-101

Responses to May 5, 2017 Federal Communications Commission Staff Questions

For Chapin Communications Corporation:

Chapin Communications Corporation (“CCC”) is the parent company of the incumbent local exchange telephone company, Farmers Mutual of Chapin d/b/a Chapin Telephone Company (“CTC”).

- **Chapin Telephone Company’s unaudited balance sheet shows** [REDACTED]

Response: CCC’s business practice is to [REDACTED]

Chapin Telephone Company’s balance sheet [REDACTED]

Response: [REDACTED]

- **Chapin Telephone Company’s unaudited Statements of Operations shows** [REDACTED]

Response: CCC and CTC presume that the reference to [REDACTED]

[REDACTED] On January 22 2016, GLC filed for
bankruptcy. [REDACTED]

REDACTED – FOR PUBLIC INSPECTION

Filed Pursuant to the Requirements of 47 C.F.R. §0.459

Supplement of Chapin Communications Corporation

WC Docket No. 17-101

Responses to May 5, 2017 Federal Communications Commission Staff Questions

- **Does Chapin Communications Corporation have an audited financial report for any or all of the calendar or fiscal years 2014, 2015, 2016 for itself and/or its wholly owned subsidiary Clinton County Telephone? If so, please provide these reports in their entirety including all statements and notes that are a part of the audited report.**

Response: CCC and CTC presume that the reference to “Clinton County Telephone” was in error in that neither CCC nor CTC has an ownership interest in Clinton County Telephone nor will they after the consummation of the underlying transaction. Accordingly, CCC will respond to this question under the presumption that the reference to “Clinton County Telephone” was intended to refer to CTC.

[REDACTED]

- **If Chapin Communications Corporation does not have the audited financial reports requested above, does it have any financial statements that have been reviewed by a Certified Public Accountant for any or all of the calendar or fiscal years 2014, 2015, and 2016? If so, please provide the CPA’s review and any notes or statements the CPA may have provided with its review.**

Response: [REDACTED]

- **How many locations in Chapin’s study area lack 10/1 Mbps broadband service and how many locations lack 25/3 Mbps broadband service?**

Response: Per A-CAM 2.2, Report Version 6.0, the Commission reported that CTC had percent served with 10/1 at 98.7%. [REDACTED]

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Supplement of Chapin Communications Corporation

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